

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
PLAINTIFF,

CASE NO.:17-22 (DRD)

v.

JORGE ALBERTO LOPEZ-RODRIGUEZ,
DEFENDANT.

MOTION TO COMPEL PRODUCTION OF ‘ALIEN FILE’

COMES NOW, the Defendant, Jorge Alberto Lopez-Rodriguez (“Mr. Lopez-Rodriguez”), through the undersigned attorney, states:

1. Mr. Lopez-Rodriguez is currently charged with Reentry of a Removed Alien, a violation of 8 U.S.C., Section 1326(a)(2).

2. The undersigned has requested the government provided him with a copy of Mr. Lopez-Rodriguez’s Alien File, or “A-File,” numerous times, via email, phone conversations, and in person. The Government, however, has yet to provide it.

3. As this Court knows, “A-Files” are files identified by an individual’s Alien Registration Number, a unique personal identifier assigned to non-citizens. It typically contains all of the official files related to immigration status, citizenship, or relief, and includes both documents submitted by the non-citizen as well as any investigations, statements, correspondence, and memoranda created by the agencies.

4. The “A-file” contains a host of documents that may contain information pertinent for trial.

5. In light of the above, Mr. Lopez-Rodriguez respectfully requests this Honorable Court enter an Order compelling the government to produce his A-File for review and duplication by undersigned counsel. In the alternative, and if this Court deems it necessary,

he requests this Court conduct an *in camera* review of the A-File to ensure it contains no information discoverable under *Brady*, *Kyles* or *Giglio*.

WHEREFORE, the Defendant, Jorge Alberto Lopez-Rodriguez, respectfully requests this Honorable Court enter an Order compelling the government to produce his A-File for review by undersigned counsel, or, if necessary, by this Court within ten days.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 6th day of February, 2017.

ERIC A. VOS, ESQ.
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